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13 Attorneys for Defendants,
14 JOHN EARL REDFERN, J. REDFERN, INC.,
dba GOLDEN STATE LANDSCAPING; JLS
15 PARTNERS, INC., dba GSL CONSTRUCTION,
EMPIRE LANDSCAPE CONSTRUCTION

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 MARCOS VARGAS, ROMUALDO
20 ALTAMIRANO, PEDRO RAMOS,
BULMARO BAZAN, MARCOS
21 MANDUJANO, JOSE: SOLIS, LUIS
PENA, BENITO CHAIREZ, FIGUEROA,
22 FREDY ROCHA, SALVADOR FLORES,
ISMAEL CORONA, EPIGMENIO
23 LOPEZ, JUAN CORONA, ENRIQUE
TAMAYO, FRANCISCO SALGADO,
24 SILVERIO TORRES, MARTIN RAMOS
RAMIREZ, ANGEL SANCHEZ, ERON
25 LOPEZ, EDUARDO VARGAS, JORGE
SOTO, RIGOBERTO SANCHEZ:, JULIO
26 LOPEZ, JOSE J. GARCIA, PEDRO
SIERRA, DAMACIO SANCHEZ, JUAN
27 GUERRA, JAIME MARTINEZ JR.,
ROBERT MONTOYA, MATEO
28 GUZMAN, LAZARO MAYA, JOSE

Case No. C-12-04052-CRB

**JOINT STIPULATION AND ORDER
REGARDING RESPONSIVE PLEADING
TO THE COMPLAINT PURSUANT TO
LOCAL RULE 6-1**

JOINT STIP. AND [PROPOSED] ORDER
REGARDING RESPONSE TO COMPLAINT

1 ESTRADA, ANICETO ALMANZA
2 SANCHEZ, EMILIO VARGAS, JOSE
3 ANTONIO ALVAREZ, ANTONIO
4 RODRIGUEZ, JOSEPH RENEE
5 RODRIGUEZ, MAURICIO SANCHEZ,
6 MAURICIO SANCHEZ ARZATE,
7 MANUEL RENTERIA, MIGUEL
8 SUCHIL MENDOZA, and VICENTE
9 MARTINEZ, individually and on behalf of
10 all others similarly situated,

11 Plaintiffs,

12 v.

13 JOHN EARL REDFERN, an individual;
14 J. REDFERN, INC., (dba "GOLDEN
15 STATE LANDSCAPING"), a California
16 Corporation; JLS PARTNERS, INC.,
17 (dba "GSL CONSTRUCTION"), a
18 California Corporation; and EMPIRE
19 LANDSCAPE CONSTRUCTION, a
20 California Corporation,

21 Defendants.

22 Plaintiffs Marcos Vargas, Romualdo Altamirano, Pedro Ramos, Bulmaro Bazan, Marcos
23 Mandujano, Jose Solis, Luis Pena, Benito Chairez, Figueroa, Fredy Rocha, Salvador Flores, Ismael
24 Corona, Epigmenio Lopez, Juan Corona, Enrique Tamayo, Francisco Salgado, Silverio Torres,
25 Martin Ramos Ramirez, Angel Sanchez, Eron Lopez, Eduardo Vargas, Jorge Soto, Rigoberto
26 Sanchez, Julio Lopez, Jose J. Garcia, Pedro Sierra, Damacio Sanchez, Juan Guerra, Jaime Martinez
Jr., Robert Montoya, Mateo Guzman, Lazaro Maya, Jose Estrada, Aniceto Almanza Sanchez, Emilio
Vargas, Jose Antonio Alvarez, Antonio Rodriguez, Joseph Renee Rodriguez, Mauricio Sanchez,
Mauricio Sanchez Arzate, Manuel Renteria, Miguel Suchil Mendoza, and Vicente Martinez,
(collectively "Plaintiffs") and Defendants John Earl Redfern, J. Redfern, Inc. (dba Golden State
Landscaping), JLS Partners, Inc. (dba GSL Construction), and Empire Landscape Construction
(collectively "Defendants") agree and stipulate, through their respective counsel, to the following
extension:

1 1. The parties are currently finalizing a settlement, and thus, they would like to direct
2 their resources and time to settlement discussions.

3 2. The settlement involves over forty individual plaintiffs and a proposed class
4 settlement of a related state action, which is why it is taking quite a bit of time to finalize.

5 3. The state court has indicated that the motion for approval of the state court class
6 settlement should be filed no later than July 12, 2013.

7 4. The settlement of the Plaintiffs' claims in this matter will be contingent upon court
8 approval of the class settlement.

9 5. The parties would like additional time to finalize the settlement agreements and have
10 agreed to continue the deadline for Defendants' responsive pleading to Plaintiff's complaint from
11 May 24, 2013 until July 16, 2013.

12 3. The parties also request that the initial Case Management Conference, which is
13 scheduled for June 14, 2013, also be postponed to August 7, 2013.

14 THEREFORE, the parties hereby stipulate and request that this Court order the following:

15 1. The deadline for Defendants to file their responsive pleading to Plaintiffs' complaint
16 is set for July 16, 2013.

17 2. The Case Management Conference be scheduled for August 9, 2013 or to a date
18 convenient for the Court.

1 Dated: May 24, 2013
2

3 */s/ Marco A. Palau*
4

5 MARCO A. PALAU
6 LAW OFFICES OF MALLISON &
7 MARTINEZ
8 Attorneys for Plaintiffs
9 MARCOS VARGAS, ROMUALDO
10 ALTAMIRANO, PEDRO RAMOS,
11 BULMARO BAZAN, MARCOS
12 MANDUJANO, JOSE: SOLIS, LUIS PENA,
13 BENITO CHAIREZ, FIGUEROA, FREDY
14 ROCHA, SALVADOR FLORES, ISMAEL
15 CORONA, EPIGMENIO LOPEZ, JUAN
16 CORONA, ENRIQUE TAMAYO,
17 FRANCISCO SALGADO, SILVERIO
18 TORRES, MARTIN RAMOS RAMIREZ,
19 ANGEL SANCHEZ, ERON LOPEZ,
20 EDUARDO VARGAS, JORGE SOTO,
21 RIGOBERTO SANCHEZ:, JULIO LOPEZ,
22 JOSE J. GARCIA, PEDRO SIERRA,
23 DAMACIO SANCHEZ, JUAN GUERRA,
24 JAIME MARTINEZ JR., ROBERT
25 MONTOYA, MATEO GUZMAN, LAZARO
26 MAYA, JOSE ESTRADA, ANICETO
27 ALMANZA SANCHEZ, EMILIO VARGAS,
28 JOSE ANTONIO ALVAREZ, ANTONIO
RODRIGUEZ, JOSEPH RENEE
RODRIGUEZ, MAURICIO SANCHEZ,
MAURICIO SANCHEZ ARZATE, MANUEL
RENTERIA, MIGUEL SUCHIL MENDOZA,
and VICENTE MARTINEZ

Dated: May 24, 2013

1 */s/ Marlene S. Muraco*
2

3 MARLENE S. MURACO
4 LITTLER MENDELSON
5 A Professional Corporation
6 Attorneys for Defendants
7 JOHN EARL REDFERN, J. REDFERN, INC.,
8 dba GOLDEN STATE LANDSCAPING; JLS
9 PARTNERS, INC., dba GSL
10 CONSTRUCTION, EMPIRE LANDSCAPE
11 CONSTRUCTION

1 IT IS SO ORDERED:
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4 Dated: May 30, 2013
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6 Firmwide:120509945.1 059436.1001
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